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RICHARD TRAVERSO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD TRAVERSO,

Plaintiff,

vs.

CLEAR CHANNEL OUTDOOR, INC.; and
DOES 1 through 10, inclusive,

Defendants.

Case No. C07-3629 MJJ

**NOTICE OF MOTION AND MOTION TO
COMPEL FURTHER RESPONSES TO
WRITTEN DISCOVERY AND TO
COMPEL THE DEPOSITIONS OF
WILLIAM HOOPER AND PATRICK
POWERS**

Date: March 18, 2008
Time: 9:30 a.m.
Courtroom: 11 (19th Floor)
Judge: Hon. Martin J. Jenkins

Action Removed: July 13, 2007
Trial Date: April 7, 2008

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on March 18, 2008 at 9:30 a.m. in Courtroom 11 (19th
3 Floor) of the Court located at 450 Golden Gate Avenue, San Francisco, California, Plaintiff
4 RICHARD TRAVERSO will move the Court for an order directing Defendant CLEAR
5 CHANNEL OUTDOOR, INC. ("Clear Channel") to serve further responses to written discovery
6 and to produce for deposition Messrs. William Hooper and Patrick Powers, pursuant to Rule 26 of
7 the Federal Rules of Civil Procedure and Local Rule 37.

8 Plaintiff's motion is made on the following grounds:

- 9 1. Plaintiff served written discovery on Clear Channel.
- 10 2. Clear Channel initially refused to produce documents or answer interrogatories.

11 However, during the meet and confer, Clear Channel agreed to produce documents as well as
12 provide certain information to Plaintiff. Despite Clear Channel's representations, it has not
13 produced all the documents or information agreed upon during the meet and confer. Further,
14 Clear Channel has sought the same documents and information from Plaintiff, which Plaintiff has
15 produced, but which Clear Channel continues to refuse to produce.

16 3. Clear Channel has further refused to produce two of its employees for deposition,
17 although their depositions were set within the time to complete discovery, and Plaintiff made
18 himself available for deposition, and sat for a day long deposition, after discovery cut-off.

19 Plaintiff's motion shall be based on this Notice of Motion and Motion to Compel Further
20 Responses to Written Discovery and to Compel the Depositions of William Hooper and Patrick
21 Powers; the attached memorandum of points and authorities, separate statement, declarations of
22 Joseph P. McMonigle and Garret D. Murai, and the deposition transcript of Richard Traverso; and
23 any other pleadings or other evidence as may be submitted.

24 Dated: February 11, 2008

WENDEL, ROSEN, BLACK & DEAN LLP

25 By: /s/ Richard A. Sipos

26 Richard A. Sipos
27 Attorneys for Plaintiff
28 RICHARD TRAVERSO

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